

Message

From: McSmith, Justin@Waterboards [Justin.McSmith@Waterboards.ca.gov]
Sent: 8/2/2018 10:08:54 PM
To: Chuck Durham [Chuck.Durham@pgenv.com]; Goodwin, Cathleen@Waterboards [Cathleen.Goodwin@waterboards.ca.gov]; Polek, Jim [Polek.Jim@epa.gov]
CC: Whitson, Amelia [Whitson.Amelia@epa.gov]; Sirese Jacobson [sirese.jacobson@pgenv.com]
Subject: RE: EPA IU Inspections in Northern CA
Attachments: ATT00001.txt

Thank you very much for the clarification Chuck. We can address this with them during the inspection.

Justin

From: Chuck Durham [mailto:Chuck.Durham@pgenv.com]
Sent: Thursday, August 02, 2018 3:07 PM
To: McSmith, Justin@Waterboards <Justin.McSmith@Waterboards.ca.gov>; Goodwin, Cathleen@Waterboards <Cathleen.Goodwin@waterboards.ca.gov>; Jim Polek <Polek.Jim@epa.gov>
Cc: Amelia Whitson <Whitson.Amelia@epa.gov>; Sirese Jacobson <Sirese.Jacobson@pgenv.com>
Subject: RE: EPA IU Inspections in Northern CA

Hi Justin,

Just a comment on Cypress Grove Chevre. While 40 CFR Part 405 does not have indirect discharge standards established, and therefore would not be an applicable category. Since 405.66 simply says 'must comply with 403',...and therefore POTWs should not be classifying or reporting these facilities as CIUs. In the 2016 PCI report, this facility was identified as a non-categorical SIU, so it's interesting that the City would report them as a CIU in this last annual report. Something to address when Jim and Sirese are out there maybe.

Thanks,

Chuck Durham
PG Environmental
615-888-2928 (Office)

From: McSmith, Justin@Waterboards <Justin.McSmith@Waterboards.ca.gov>
Sent: Thursday, August 2, 2018 4:44 PM
To: Goodwin, Cathleen@Waterboards <Cathleen.Goodwin@waterboards.ca.gov>; Jim Polek <Polek.Jim@epa.gov>
Cc: Whitson, Amelia <Whitson.Amelia@epa.gov>; Sirese Jacobson <Sirese.Jacobson@pgenv.com>; Chuck Durham <Chuck.Durham@pgenv.com>
Subject: RE: EPA IU Inspections in Northern CA

Good afternoon Jim,

Thank you for letting us know about the inspections.

For Arcata, it is my understanding that they do have an official pretreatment program with SUO and established Local Limits. They will be updating their NPDES Permit in early 2019 and the Draft Permit I have attached their 2017 annual pretreatment report. They report two CIUs (Cyprus Grove Chevre 405.66 and Pacific Powder Coating 433.17). They also have a local CSD and University discharging to the system. Which industries were you looking at for Arcata. Rachel Hernandez is the environmental compliance officer that will be your best contact, rhernandez@cityofarcata.org.

<https://www.cityofarcata.org/333/PretreatmentFOG> This link will take you to the City's webpage for their pretreatment program. I am sure the City would like to hear your opinion on any cannabis related pretreatment that may be in development or being discussed. Thanks.

Justin McSmith

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From: Goodwin, Cathleen@Waterboards
Sent: Thursday, August 02, 2018 2:16 PM
To: Polek, Jim <Polek.Jim@epa.gov>; McSmith, Justin@Waterboards <Justin.McSmith@Waterboards.ca.gov>
Cc: Amelia Whitson <Whitson.Amelia@epa.gov>; Sirese Jacobson <sirese.jacobson@pgenv.com>; Chuck Durham <Chuck.Durham@pgenv.com>
Subject: RE: EPA IU Inspections in Northern CA

Hi Jim:

Good to hear from you.

For Ukiah, you can contact Sean White at swhite@cityofukiah.com. His desk number is 707-467-5712. I was in email communication with Sean today, so I know he is around. FYI, this has been a really bad year for devastating fires in northern California. There are two large fires burning in Mendocino County. As of yesterday, the City of Ukiah and treatment plant were not affected by the fires. They seem to be moving easterly into Lake County. Your inspection is two weeks away, so hopefully the fires will be controlled or out, but it's so hard to predict due to the hot and dry conditions.

My schedule is clear August 15 and 16. I have an important meeting the afternoon of August 14. If you did the Eureka follow-up late morning or afternoon on August 15, I could participate. I will definitely plan on participating in the Ukiah inspection. At Eureka, are you strictly following up at Pacific Seafood, or will you be doing anything else?

I will try to review the Eureka PCA Draft Summary Report before your visit. Do you propose finalizing the report separately from the report you prepare after your follow-up visit, or would you want to produce a combined report?

Cathy

From: Polek, Jim [<mailto:Polek.Jim@epa.gov>]
Sent: Thursday, August 02, 2018 2:01 PM
To: Goodwin, Cathleen@Waterboards <Cathleen.Goodwin@waterboards.ca.gov>; McSmith, Justin@Waterboards <Justin.McSmith@Waterboards.ca.gov>
Cc: Amelia Whitson <Whitson.Amelia@epa.gov>; Sirese Jacobson <sirese.jacobson@pgenv.com>; Chuck Durham

<Chuck.Durham@pgenv.com>

Subject: EPA IU Inspections in Northern CA

Hi Cathy and Justin,

I wanted to confirm with you guys that EPA is planning to conduct industrial user inspections in Eureka, Arcata, and Ukiah the week of August 13th, as mentioned in the email chain below. I am sorry for not contacting you earlier but I was on vacation and this inspection trip came up quickly. We are trying to use contractor money before the end of our fiscal year.

The inspections will be conducted by a PG Environmental inspector and me. It would be great if either of you could participate in some or all of the inspection, and I totally understand if it doesn't work with your schedules.

The main reason for conducting inspections in northern CA is to follow-up on the January 2018 findings at Pacific Choice Seafood (Cathy, I apologize that it has taken me six months to get out to this facility). We will be Eureka/Arcata Tuesday (8/14/18) and Wednesday (8/15/18), and Ukiah on Thursday (8/16/18). We are planning to conduct two inspections per day. I will forward a list of targets once we finalize it.

I did have two questions for you guys:

- 1) I was talking with Amelia Whiston about Arcata's Pretreatment Program. Can you confirm whether or not Arcata has an approved pretreatment program? The lack of an approved program would affect the targeting choices.
- 2) Do you have a contact at Ukiah? I have contacts at Eureka and Arcata and I plan to call them today to let them know about our inspection trip and invite their inspectors to participate.

Let me know if you have any questions or concerns. Thanks.

Jim

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From: Whitson, Amelia

Sent: Tuesday, July 10, 2018 5:38 PM

To: Kettie Rupnik <Kettie.Rupnik@pgenv.com>; Polek, Jim <Polek.Jim@epa.gov>

Cc: Chuck Durham <Chuck.Durham@pgenv.com>; Yatasha Moore <Yatasha.Moore@pgenv.com>; Goodwin, Cathleen@Waterboards <Cathleen.Goodwin@waterboards.ca.gov>; McSmith, Justin@Waterboards <Justin.McSmith@Waterboards.ca.gov>

Subject: RE: IU Targeting Questions

Hi Kettie,

Sure thing – attached is an SIU inventory that was completed by PG Environmental in 2010. Nor-Cal Products (now located in Yreka) has been submitting compliance reports to the Regional Board since then, and copies EPA (latest report also attached). You're correct that Ukiah and Fort Bragg don't have formal pretreatment programs.

I don't have any other information beyond this regarding IU targeting, but I hope this is a good starting place. I'm cc-ing Cathy and Justin at the Regional Board to loop them in, and in case they have any other input.

Many thanks,

Amelia Whitson
Pretreatment Coordinator
NPDES Permits Office (WTR-2-3)
US EPA, Region 9
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San Francisco, CA 94105
(415) 972-3216

From: Kettie Rupnik [<mailto:Kettie.Rupnik@pgenv.com>]
Sent: Friday, July 6, 2018 10:38 AM
To: Whitson, Amelia <Whitson.Amelia@epa.gov>; Polek, Jim <Polek.Jim@epa.gov>
Cc: Chuck Durham <Chuck.Durham@pgenv.com>; Yatasha Moore <Yatasha.Moore@pgenv.com>
Subject: IU Targeting Questions

Amelia,

I hope all is well. We had a conversation with Jim this morning about targeting IUs for the inspections we'll be conducting in the Northern California area during the week of August 13th. I was wondering if you had any specific information regarding nondomestic dischargers/IUs/etc. for Ukiah and Fort Bragg?

As I understand it, Ukiah and Fort Bragg don't have formal programs, correct? We'll also be looking at Arcata and Eureka, so if you have any specific concerns about those areas or have any additional information about IU targeting, that would also be greatly appreciated!

Thanks,
Kettie

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